

US EPA ARCHIVE DOCUMENT



Internal DfE Logo Pilot for Disinfectants

April 23, 2009



Discussion Points

- ❑ Background
- ❑ Previous Products
- ❑ Issues That Arose
- ❑ Draft – Facts to Consider
- ❑ Next Steps



Background

- ❑ Currently, products that make cleaning claims are permitted to apply for the Design for the Environment “logo” once they’ve completed their review.
- ❑ Most of the antimicrobial hard, non-porous surface disinfectants labeling contains uses as pesticides and as cleaners.



Background (cont'd)

- ❑ OPP and OPPTS DfE agreed to work together to determine the feasibility of allowing products that have passed the DfE review to submit a label amendment to OPP in order place the logo on pesticide products.



Previous Products

- ❑ DfE sent OPP 3 previous products for review that passed their review.
- ❑ OPP sent 8 products to DfE for review.
 - The products forwarded by OPP ranged from acute tox classification I-IV.
 - The products forwarded by OPP contained different active ingredients.
 - The products forwarded by OPP involved different use sites.



Issues That Arose

- ❑ OPP staff were required to complete TSCA CBI training before DfE could provide records.
- ❑ DfE staff were required to complete FIFRA CBI training before OPP could provide records.
- ❑ OPP expanded participation to include RD, BPPD, FEAD, and HED.



Issues that Arose (cont'd)

- ❑ Question as to whether or not EFED also needs to be involved.
- ❑ There was a need to bring new workgroup members “up to speed”.



Draft – Criteria to Consider

- ❑ No carcinogens
- ❑ No acute tox I or II products
- ❑ No unresolved 6(a)(2) issues
- ❑ No unresolved efficacy failures
- ❑ No current enforcement action
- ❑ Only OPP approved statements could be made regarding the logo.



Draft - Facts to Consider (cont'd)

- ❑ No products with unapproved inerts
- ❑ No outstanding “conditional registration” data issues
- ❑ No PPE required to use the product
- ❑ Inert ingredient disclosure on Label
- ❑ No developmental tox issues
- ❑ The complete product formulation would be reviewed – individual components and final formulation



Next Steps

- ❑ OPP/DfE will review a “second round” of products.
- ❑ Refine the factors to consider.
- ❑ Continue to seek advice from the PPDC on the merits of a Pilot.



Questions?